

INTEGRATIVE THERAPEUTICS INC.



NF Formulas



PhytoPharmica



Tyler Encapsulations

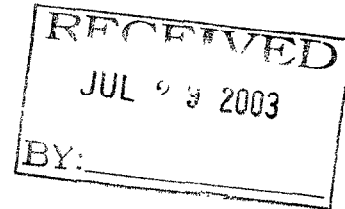


Vitaline Formulas

7763 '03 JUL 31 12:07

July 24, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740



Notification of structure-function claims

Dear Sir:


This letter is to notify you that the following product manufactured, packed, and/or distributed by Integrative Therapeutics, Inc. (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature which contains statements provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Integrative Therapeutics, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and complies with section 403(r)(6) of the act.

Product Name
Pure Kids®

Statement
"Introducing a natural support system that every young body needs."*

Ingredient(s) to which claim refers
Milk thistle seed extract (*Silybum marianum*)
N-Acetyl-L-Cysteine (NAC)
Calcium D-glucarate
Trimethylglycine (betaine, anhydrous)
Alpha-Ketoglutaric acid
Taurine
L-Glutathione, reduced
Selenium
L-Methionine
Choline (bitartrate)
Methylsulfonylmethane (MSM)

I certify that the information contained in this notice is complete and accurate, and that Integrative Therapeutics, Inc. has substantiation that the statement is truthful and not misleading.


Mario Roxas, M.D.
Director of Scientific and Technical Affairs

Date

7/24/03

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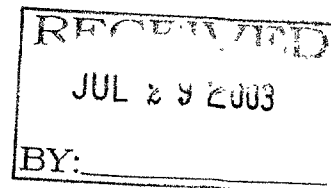
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Product Name

Pure Kids®

Statement

"This natural support system is the result of years of experience and developed by leading children's medical experts at the International Child Development Resource Center (ICDRC) and specialists in naturopathic therapeutics at Integrative Therapeutics, Inc."

Ingredient(s) to which claim refers

Milk thistle seed extract (*Silybum marianum*)
N-Acetyl-L-Cysteine (NAC)
Calcium D-glucarate
Trimethylglycine (betaine, anhydrous)
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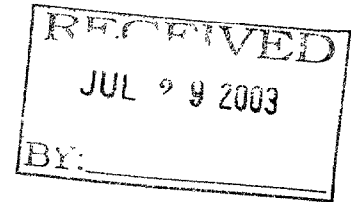
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Product Name	Statement	Ingredient(s) to which claim refers
Pure Kids®	"The Learner's Edge® System...it's what every young body needs, and what every parent should know about."*	Milk thistle seed extract (<i>Silybum marianum</i>) N-Acetyl-L-Cysteine (NAC) Calcium D-glucarate Trimethylglycine (betaine, anhydrous) Alpha-Ketoglutaric acid Taurine L-Glutathione, reduced Selenium L-Methionine Choline (bitartrate) Methylsulfonylmethane (MSM)

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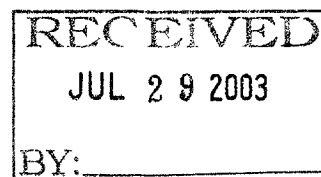
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Product Name	Statement	Ingredient(s) to which claim refers
Pure Kids®	"The Learner's Edge® System gives kids the edge they need in today's complex and often unhealthy environment, with support for natural detoxification...."	Milk thistle seed extract (<i>Silybum marianum</i>) N-Acetyl-L-Cysteine (NAC) Calcium D-glucarate Trimethylglycine (betaine, anhydrous) Alpha-Ketoglutaric acid Taurine L-Glutathione, reduced Selenium L-Methionine Choline (bitartrate) Methylsulfonylmethane (MSM)

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